## Federal Defenders OF NEW YORK, INC.

One Pierrepont Plaza-16th Floor, Brooklyn, NY 11201 Tel: (718) 330-1200 Fax: (718) 855-0760

David E. Patton Executive Director and Attorney-in-Chief Deirdre D. von Dornum Attorney-in-Charge

February 15, 2024

The Honorable Pamela K. Chen United States District Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: <u>United States v. Douglas Noel</u>, 23-CR-320 (PKC)

Dear Judge Chen:

Mr. Douglas Noel is currently scheduled to appear before the Court on February 20, 2024, for a status hearing. The parties are in the process of preparing mitigation materials and engaging in plea negotiations. Additional time is required to submit supplemental mitigation materials and for the review of those materials.

In light of the current status of the case, the parties jointly request that the Court continue the status hearing approximately 90 days and that time be excluded under the Speedy Trial Act to allow for the production and review of discovery, plea negotiations, and defense preparation.

Thank you for your consideration.

Respectfully Submitted,

/s

Nora K. Hirozawa Counsel to Douglas Noel Federal Defenders of New York, Inc. One Pierrepont Plaza, 16<sup>th</sup> Floor Brooklyn, NY 11201 (718) 330-1290

cc: AUSA Joshua Dugan